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Attorneys for Respondent

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ALLEN T. REED,

Petitioner,

v.

BRANDON KELLY,

Respondent.

Case No. 2:21-cv-01499-HZ

DECLARATION OF NICK M. KALLSTROM
IN SUPPORT OF UNOPPOSED MOTION
FOR EXTENSION OF TIME

I, Nick M. Kallstrom, declare:

1. I am an attorney licensed to practice law in the State of Oregon and an Assistant Attorney General for the State of Oregon.
2. I am counsel for respondent in the above-captioned case.
3. Petitioner filed his *Brief in Support of Petition for Writ of Habeas Corpus* (Docket No. 41) on May 12, 2023. By the accompanying motion, I am requesting a 60-day extension of time, to and including **September 22, 2023**, within which to file a reply.

4. This motion is made because respondent believes it is necessary to reply to some of the arguments in petitioner's most-recent filing and that a reply will assist the Court in resolving the issues in this case. Obligations in other matters have prevented me from completing the work necessary to prepare the reply.

5. This is respondent's second request for an extension of time.

6. Pursuant to LR. 7-1(a), counsel for respondent certifies that counsel for petitioner, Anthony Bornstein, was contacted and does not object to this motion.

7. Therefore, respondent respectfully requests a 60-day extension of time, to and including **September 22, 2023**, to file a reply to petitioner's *Brief in Support of Petition for Writ of Habeas Corpus* (Docket No. 41).

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2023.

s/ Nick M. Kallstrom
NICK M. KALLSTROM
Assistant Attorney General